UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 4, 1998

Ms. Rebecca Lynn Palmer
State Historic Preservation Office
Capitol Complex
Carson City, NV 89710

SUBJECT: U. S. Environmental Protection Agency Cleanup of Mercury-Contaminated Soils in Lyon County, NV (Carson River Superfund Site)

Dear Ms. Palmer:

Last week, our archaeological consultants, Archaeological Research Services (ARS), discovered what they believe to be a portion of the foundation of the former Birdsall Mill. The discovery was made during implementation of the 11/5/98 monitoring and treatment plan previously submitted for your review, after demolition of the house that had covered the area where the discovery was made. ARS has prepared a two-page revision to the 11/5/98 plan describing the discovery and proposing a series of data recovery activities to mitigate the effect of our cleanup project on the remains of the mill foundation and any associated features.

We would appreciate your prompt review of the enclosed revision to the 11/5/98 plan. We are continuing with other portions of the cleanup but will not disturb the timbers while we await your response.

To speed their review, I am sending the enclosed plan concurrently to you and to Alan Stanfill at the Advisory Council on Historic Preservation. Please contact me at (415) 744-2256 with your response, or with any questions or comments.

Sincerely,

Wayne Praskins
USEPA Project Manager

cc: Alan Stanfill, Advisory Council on Historic Preservation

PROPOSED REVISION TO A PLAN TO MONITOR AND TREAT EFFECTS TO HISTORIC PROPERTIES ASSOCIATED WITH THE ENVIRONMENTAL PROTECTION AGENCY'S CARSON RIVER MERCURY SITE: LOCATION MS 004, DAYTON, NEVADA — UNEXPECTED DISCOVERIES

Prepared for:

United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Prepared by

Archaeological Research Services, Inc.
Post Office Box 701
Virginia City, NV 89440

Under contract with:

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San Francisco, CA 94104

ARS Project No. 978
E & E Project No. ZU1122

December 3, 1998

When the monitoring and treatment plan was devised for MS 004, no intact archaeological features or artifact concentrations were known in the lower terrace area extending along the west side of River Street. In the course of demolishing the building at 345 River Street, timbers were noticed beneath the building. The excavation contractor felt that these timbers were old and were not associated with the building being demolished.

Concurrent with other work specified in the treatment plan, but under a separate authorization from E&E, ARS has cleared the tops of the beams and dug out sediments in part of the beam area to a depth of about 1.5 ft below general terrace level. A single hand-dug excavation unit is being excavated to a depth of no more than 3 ft below general surface to attempt to discern visible mercury concentrations and possibly the lower extent of archaeological features. This unit will be completed on December 4, 1998. Based on this preliminary work, the following observations can be made:

1. An intact foundation feature consisting of at least two layers of 12 x 12 ft timbers laid at right angles, crib fashion, occupy at least a 15 x 35 ft area, all beneath the former house.

2. A tailings ditch filled with gray tailings is on the west side of the westernmost beam.

3. Only sparse metal artifacts (larger fasteners such as pins and bolts) have been found in association so far.

4. About 10 x 20 ft of the larger feature area contains easily observed liquid mercury. It is possible that current cool conditions and damp soil have encouraged formation of mercury droplets. This mercury is present throughout the upper foot of deposit and likely goes deeper.

5. The entire feature as currently exposed is beneath the footprint of the removed house and was not available for testing by backhoe trenches dug during testing.

Based on these observations we infer that we have encountered an intact portion of the Birdsall Mill foundation. This area is within the mill building as shown in a contemporary photograph. It is the lowest level of the mill.

This foundation area is a feature that contributes to the National Register of Historic Places significance of the mill under Criterion D for its ability to contribute information about milling technology at one of the longer-running mills associated with the Comstock Lode. Work in this feature will contribute to the same research objectives discussed in the original treatment plan for MS 004.

To recover an adequate amount of information about feature construction and layout to mitigate project effects to this portion of the mill we propose the following procedures:

1. With backhoe front loader bucket scrape the terrace surrounding the hand-exposed timbers to a depth sufficient to determine the total extent of the intact foundation in this area.

2. If this feature is found to extend to a larger area, an archaeological team will clear, map, and describe the exposed continuation.

3. A backhoe trench will be excavated along the proposed retaining wall foundation adjacent to the mill foundation feature. This trench will be described and analyzed to determine if the mill foundation or associated features such as ditches extend into the proposed retaining wall area.

4. The top foot of the entire foundation area will be removed by backhoe front end loader and bucket as appropriate. The much larger equipment used for other soil removal on this terrace is too heavy and unwieldy to operate in this feature area.

5. Archaeological features exposed at the base of the one foot clearance will be documented.

6. Steps 4 and 5 will be repeated as necessary to reach the necessary depth determined by E&E to remove areas with high levels of mercury.

7. Should deposits appear during mechanical excavation that appear to be too fragile to withstand mechanical clearance, these will be sampled by hand until adequately characterized before mechanical clearance continues in these areas.

All artifacts recovered from this project are property of the landowner. Porous wood and other porous artifacts from the high mercury level area will be field described and placed into the on-site storage pile with other materials to be taken to an appropriate hazardous waste repository as arranged by E&E.

Reporting for this feature will be included in the final report for all archaeological studies connected with the Carson River Mercury Project.